

# United States Senate

WASHINGTON, DC 20510

August 20, 2014

The Honorable John M. McHugh  
Secretary of the Army  
101 Army Pentagon  
Room 3E700  
Washington, DC 20310-0101

Dear Secretary McHugh:

As Members of the Senate Defense Appropriations Committee and the Senate Armed Services Committee, we have significant concerns regarding the Army's latest round of proposed end strength reductions under the Army 2020 Force Structure Realignment. We write this letter to make Army leadership aware of our ongoing concerns related to the Supplemental Programmatic Environmental Assessment (SPEA) and to accompany and call your attention to the attached comments associated with the Army's force structure reductions.

As you are aware, we submitted comments on the Army 2020 Programmatic Environmental Assessment just seventeen months ago, in which we encouraged you to follow the National Environmental Policy Act (NEPA) process and pay particular attention to the costs inherent in your downsizing plans, the military value of the installations, and the socio-economic impacts on the communities where bases are located. We appreciated your absolute transparency and your willingness to consult regularly with the congressional delegation and the Fort Polk community throughout the process. And in the end, you decided upon and executed tough decisions to return our Army force structure to pre-9/11 levels of 490,000 soldiers.

During the 2013 round of force structure evaluations it was established that it is imperative that the record created during this process, upon which future force structure decisions will be made, be as accurate and complete as possible. We believe further steps to downsize the Army, in the midst of the current downsizing, is ill-timed and dangerous. We realize the Army is responding to legislative budget imperatives and is reducing its end-strength further to achieve required savings. As you are well aware, the 2013 PEA did not assess reductions that would be required or result from full 2011 Budget Control Act/sequester-level funding. Failing to adequately evaluate the impacts of end-strength reductions and structure adjustments will result in a "hollow" Army.

For this reason, we and fellow like-minded Senators will continue to work with you to satisfy the nation's requirement for an adequately-sized Army in extremely unpredictable times. The Army is downsizing too fast and appears to be in auto-pilot, essentially in a free fall to a much smaller force structure that is in complete misalignment with our national security requirements. We realize Congress needs provide the Army with the resources necessary to prevent a collapse at the moment when the nation may need the Army the most. We are committed to do so in a united and bipartisan manner.

We are also concerned that the Army continues to focus its reductions so intensely on its core combat strength, namely, and once again, on the Brigade Combat Team. We firmly believe that if cuts do become necessary, the Army should look across its entire enterprise to determine the most appropriate places where cuts can be made to assure that the Army can fulfill its mission. For these fundamental reasons, we believe the current proposal should be withdrawn, along with its accompanying SPEA.

Coupled with the above concerns, we believe that the SPEA suffers from fundamental flaws that prevent it from serving as an effective decision-making tool:

First, the SPEA uses an improper baseline for its impacts analysis. The SPEA must include a "no action alternative" to serve as a baseline for the Army to compare the magnitude of environmental and socioeconomic effects of the "action alternatives" it is considering. The SPEA's no action alternative of 562,000 soldiers fails to account for the soldier reductions that the Army approved in 2013 and is currently implementing. An unrealistic baseline is both impermissible under NEPA and skews the SPEA's analysis of effects. The SPEA must include a proper no action alternative of 490,000 soldiers to reflect ongoing soldier reductions.

Second, the SPEA failed to evaluate the alternative of 440,000 to 450,000 soldiers. The SPEA must rigorously explore and objectively evaluate a reasonable range of alternatives to inform the Army's decision-making. The SPEA only evaluated a single action alternative – reducing end strength to 420,000 soldiers, which represents a "worst case scenario" based upon the potential that sequestration-level cuts are imposed in FY 2016 and beyond. The Army failed to evaluate an end strength alternative of 440,000 to 450,000 soldiers, which is the end strength identified in the 2014 Quadrennial Defense Review and cited by General Odierno in testimony to Congress as the "absolute floor for end-strength reductions." An end strength alternative of 440,000 to 450,000 soldiers is reasonable and realistic, and therefore must be evaluated in the SPEA. The Army's argument that this alternative had already been assessed and was not required fails to account for the Army's own statements and documents from briefing materials, which say "Measures used to mitigate socio-economic impacts of the reductions announced in June 2013 on U.S. installations/communities are no longer available as the Army reduces below 490K."

Third, as noted above, the Army fails to adequately look at the entire Army enterprise when considering force structure reductions. The notion that the Army cannot evaluate commands with less than 1,000 personnel is unconvincing. There is a wide arc of acquisition, logistics, training, R&D, arsenals and other activities which should be thoroughly analyzed for efficiencies before the Army simply pivots once again to Brigade Combat Team strength. The Air Force has effectively looked across its entire enterprise in making painstakingly difficult cuts. We urge you to reconsider the activities and commands to be analyzed. We will closely examine how you consider all of your equities in this next round of downsizing.

Consistent with our response last year, we appreciate the Army's commitment to studying socio-economic impacts in the SPEA. As you know, Fort Polk is located in a rural part of Louisiana, where it would be extremely difficult for the community to absorb such a strong blow to its economy. It is important to note that Fort Polk is the state's largest employer and greatest



single economic driver. In the last ten years, the State of Louisiana has invested more than \$160 million in highway, aviation, residential, education and public works infrastructure primarily for the benefit of the U.S. Army – not because of a BRAC or “Grow the Army” action, but because Louisiana is a committed partner to Fort Polk. In the same spirit, Fort Polk is the only Army installation with a successful and ongoing land acquisition program, which makes losing soldiers, at the same time our citizens are cooperating with the Army to sell their land so the base may expand, such a vexing problem and wholly unnecessary endgame at Fort Polk.

Finally, while we realize your use of a Military Value Model will take place separately from the NEPA process, we note that the December 2013 GAO Report titled “*Defense Infrastructure: Army Brigade Combat Team Inactivations Informed by Analyses, but Actions Needed to Improve Stationing Process*,” finds that the Army has not formalized its Military Value Model, nor is there a process to review and update the model. The GAO also cites the Center for Army Analysis’s acknowledgement that “a new stationing decision may require different attributes to be included in the model.” Considering that this entire process is being driven by the budget, now is the time to formally include fixed costs at installations under review, including the cost of energy and the cost of living and housing for soldiers and Army civilians. The Army has focused significantly on energy costs, and for good reason. But, we have seen no indication that these costs have been factored into your Army 2020 downsizing decisions. We urge you to incorporate energy and fixed overhead costs in the Military Value Model and fully consider these comments to the SPEA during your decision making.

Thank you for your consideration.

Sincerely,



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Mary L. Landrieu  
United States Senator



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